

**FILED**

JAN 31 2011

ROBERT D. DENNIS, CLERK  
U.S. DIST. COURT, WESTERN DIST. OF OKLA.  
BY \_\_\_\_\_ DEPUTYRayford R. Bonner Jr  
Name2828 S.E. 89th Terrace OKC OK 73159  
AddressUNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMARayford Bonner Jr, Plaintiff  
(Full Name)**CIV-11-95**CASE NO. 95  
(To be supplied by the Clerk)

v.

Sheriff Joseph K. Lester, Defendant (s)CIVIL RIGHTS COMPLAINT  
PURSUANT TO 42 U.S.C.  
§1983D.A. Susan Caswell

## A. JURISDICTION

1) Rayford Bonner Jr, is a citizen of Oklahoma  
(Plaintiff) (State)  
who presently resides at 2828 S.E. 89th Terrace OKC OK 73159  
(Mailing address or place  
of confinement)

2) Defendant Sheriff Joseph K. Lester is a citizen of  
(Name of first defendant)  
Moore OK Cleveland County, and is employed as  
(City, State)  
Sheriff. At the time the claim(s)  
(Position and title, if any)

alleged in this complaint arose, was this defendant acting under color of  
state law? Yes ☒ No ☐. If your answer is "Yes", briefly explain:

Chained to the floor 7-8 months overcrowding of suicidal inmates

- 3) Defendant Susan Casswell is a citizen of  
 (Name of second defendant)  
Moore OK Cleveland County, and is employed as  
 (City, State)  
District Attorney. At the time the claim(s)  
 (Position and title, if any)  
 alleged in this complaint arose was this defendant acting under color of state law? Yes ☒ No ☐. If your answer is "Yes", briefly explain:  
Police report changed, Abbott House Interview Redone.  
And A Voice Tape recording redone with someone else's voice!!!!
- (Use the back of this page to furnish the above information for additional defendants.)
- 4) Jurisdiction is invoked pursuant to 28 U.S.C. §1343(3); 42 U.S.C. §1983. (If you wish to assert jurisdiction under different or additional statutes, you may list them below.)

#### B. NATURE OF THE CASE

- 1) Briefly state the background of your case.
- The whole nature of the case began as me an innocent man. Then on November 21, 2008 I went to CCDC. For originally 3 counts of Rape 4th degree, on a 13 year old child, then 3 counts of lewd acts with a minor, and rape by instrumentation, that is 3 counts also. A total of 9 counts. When trial came only six! Detective Kevin Morrissey Help Set it up from new castle. I just got caught in a lot of racism. There was no proof to even say that I was guilty so they modified the case. The names are Detective Kevin Morrissey, Keith Sorrell, Detective Terrance Coleman Kaylee Sorrell, And The Abbott house! The Taped Recording Was Noticeable it you could hear my voice! Counsel Advised me to keep quiet and Mrs. Casswell knew of this and Tried to convict me on lies plus Tampering with evidence that was in my favor! I have family that was at my trial every step of the way! So they also heard The Tape and saw many other things such as The Alleged victim says with no words! "I Don't Remember" A child playing games Didn't notice The Jury Watching her every move, even seeing and reading her lips. And laughing At the Preliminary Hearing And still was bound over for Trial. So I spent fourteen 1/2 months in Cleveland County for A crime I did not commit!!!!

C. CAUSE OF ACTION

- 1) I allege that the following of my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: (If necessary you may attach up to two additional pages (8½" x 11") to explain any allegation or to list additional supporting facts.)

A) (1) Count I: first, eighth, fourteenth Amendments

---

---

(2) Supporting Facts: (Include all facts you consider important, including names of persons involved, places and date. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

B) (1) Count II: Mail Tampered with while in CCDC  
Chained to the floor for 7-8 months Joseph K. Lester let  
it happen

(2) Supporting Facts:

C) (1) Count III: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(2) Supporting Facts:

**D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF**

- 1) Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to the conditions of your imprisonment? Yes ☐ No ☒ If your answer is "Yes", describe each lawsuit. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

a) Parties to previous lawsuit:

Plaintiffs: \_\_\_\_\_

Defendants: \_\_\_\_\_

b) Name of court and docket number \_\_\_\_\_  
\_\_\_\_\_

c) Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_  
\_\_\_\_\_

d) Issues raised \_\_\_\_\_

e) Approximate date of filing lawsuit \_\_\_\_\_

f) Approximate date of disposition \_\_\_\_\_

- 2) I have previously sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part C. Yes ☒ No ☐ . If your answer is "Yes", briefly describe how relief was sought and the results. If your answer is "No", briefly explain why administrative relief was not sought.

At the time I didn't know there was a grievance process. When I found out about it I tried it and was not always successful. Chief Kidd would not allow us to complete our I F P. To properly respond to the court

E. REQUEST FOR RELIEF

- 1) I believe that I am entitled to the following relief:

Pawnative \$2,000,000 Dollars  
Compensatory \$2,000,000 Dollars

~~Signature of Attorney (if any)~~

2828 S.E. 89th OKC OK

73159 (405) 973-8560

(Attorney's full address and  
telephone number.)



Signature of Petitioner

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares (or certifies, verifies, or states) under penalty of perjury that he is the plaintiff in the above action, that he has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. § 1746. 18 U.S.C. § 1621.

Executed at 2828 S.E. 89th OKC OK 73159 on 1-31-2011, ~~XXXX~~  
(Location) (Date)

Rayford B. Bonnett  
(Signature)